

SAGE LAW PARTNERS, LLC
JOHN MAYER (Bar No. 10959)
Email: jmayer@sagelawpartners.com
140 North Union Ave., Suite 220
Farmington, UT 84025
Telephone: (801) 438-7120
Facsimile: (801) 438-7121

MANATT, PHELPS & PHILLIPS, LLP
JOSEPH E. LASKA (pro hac vice)
Email: jlaska@manatt.com
KETAKEE R. KANE (pro hac vice)
Email: kkane@manatt.com
One Embarcadero Center, 30th Floor
San Francisco, CA 94111
Telephone: (415) 291-7400
Facsimile: (415) 291-7474

Attorneys for Defendant
CALIFORNIA PHYSICIANS' SERVICE dba
BLUE SHIELD OF CALIFORNIA

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

KENNETH P. and NATASIA P., Plaintiffs, vs. BLUE SHIELD OF CALIFORNIA, Defendant.	Civil No. 2:18-cv-00034 BSJ REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO TRANSFER VENUE UNDER THE DOCTRINE OF <i>FORUM NON CONVENIENS</i> Judge Bruce S. Jenkins
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PLEASE TAKE NOTICE THAT under Federal Rule of Evidence 201,
Defendant California Physicians' Service dba Blue Shield of California ("Blue Shield")
respectfully requests that the Court take judicial notice of Exhibits 1-3 in support of Blue
Shield's Motion to Transfer Venue.

1. A printout of the California Secretary of State's website, establishing the principal place of business for California Physicians' Service, attached to the Declaration of Ketakee Kane ("Kane Decl.") as **Exhibit 1**.

2. A printout of the Utah Secretary of State's website, establishing that California Physicians' Service is not incorporated in Utah, attached to the Kane Decl. as **Exhibit 2**.

3. A printout of the Utah Insurance Department website, establishing that California Physicians' Service is not registered with the Utah Insurance Department, attached to the Kane Decl. as **Exhibit 3**.

Federal Rule of Evidence 201(b) provides that the Court may take judicial notice of a fact not subject to reasonable dispute that is either: (1) generally known within the territorial jurisdiction of the trial court; or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.

The Court may take judicial notice of **Exhibits 1- 3** because they are public records. The Court may take judicial notice of public records, including official government publications.

Clemons v. Bohannon, 956 F.2d 1523, 1532 n.2 (10th Cir. 1992); *Am. Bankers Ass'n v. Nat'l Credit Union Admin.*, 347 F. Supp. 2d 1061, 1067 (D. Utah 2004). Government websites are considered official government publications. *U.S. v. Iverson*, 818 F.3d 1015, 1022 (10th Cir. 2016); *Global BTG LLC v. Nat'l Air Cargo, Inc.*, 2011 WL 2572337, *1 (C.D. Cal. June 29, 2011) (taking judicial notice of a print out of the California Secretary of State's website).

Blue Shield respectfully requests that the Court take judicial notice of Exhibits 1-3.

Dated: May 29, 2018

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Ketakee R. Kane
Ketakee R. Kane
Attorneys for Defendant
CALIFORNIA PHYSICIANS' SERVICE dba BLUE
SHIELD OF CALIFORNIA